

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., <i>et al.</i> ,	)	Case No. 01-1139 (JKF)
	)	Jointly Administered
Debtors.	)	

**MOTION TO SHORTEN NOTICE WITH RESPECT TO THE MOTION FOR AN  
ORDER PURSUANT TO SECTION 107(b) OF THE BANKRUPTCY CODE, RULE 9018  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE, AND LOCAL RULE  
9018-1(b) AUTHORIZING THE OFFICIAL COMMITTEE OF ASBESTOS PERSONAL  
INJURY CLAIMANTS AND DAVID T. AUSTERN, THE COURT APPOINTED LEGAL  
REPRESENTATIVE FOR FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS,  
AND DIRECTING THE CLERK OF THE COURT, TO FILE UNDER SEAL FOUR  
EXHIBITS TO THE REPLY OF OFFICIAL COMMITTEE OF ASBESTOS PERSONAL  
INJURY CLAIMANTS AND DAVID T. AUSTERN, THE COURT APPOINTED LEGAL  
REPRESENTATIVE FOR FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS,  
IN SUPPORT OF MOTION TO COMPEL TESTIMONY AND DOCUMENT  
PRODUCTION CONCERNING GRACE'S PRE-PETITION ESTIMATES OF ITS  
PERSONAL INJURY ASBESTOS LIABILITY**

The Official Committee of Asbestos Personal Injury Claimants (the "ACC") and David T. Austern, the Court Appointed Legal Representative for Future Asbestos Personal Injury Claimants (the "FCR") (collectively, the "Movants"), by and through the undersigned counsel, pursuant to Del. Bankr. LR 9006-1(e), Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Sections 102 and 105 of Title 11 of the United States Code, hereby move this Court (the "Motion") for the entry of an order shortening the notice period with respect to the "Motion for an Order Pursuant to Section 107(b) of the Bankruptcy Code, Rule 9018 of the Federal Rules of Bankruptcy Procedure, Rule 9018 of the Federal Rules of Bankruptcy Procedure, and Local Rule 9018-1(b) Authorizing the Official Committee of Asbestos Personal Injury Claimants and David T. Austern, the Court Appointed Legal Representative for Future Asbestos Personal Injury Claimants, and Directing the Clerk of the Court, to File Under Seal Four Exhibits to the Reply of Official Committee of Asbestos Personal

Injury Claimants and David T. Austern, the Court Appointed Legal Representative for Future Asbestos Personal Injury Claimants, in Support of Motion to Compel Testimony and Document Production Concerning Grace's Pre-Petition Estimates of Its Personal Injury Asbestos Liability" (the "Motion to Seal"), and for leave from this Court's Amended Order Scheduling Omnibus Hearing Dates for 2007 [D.I. 14068] (the "Scheduling Order") and this Court's Second Amended Order Establishing Case Management Procedures and Hearing Schedule [DI 14028] (the "CMO") to allow the Motion to Seal to be heard, if necessary, during the May 2, 2007 omnibus hearing. In support of the Motion, the Movants respectfully represent as follows:

1. Rule 9006-1(e) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware provides that "[n]o motion will be scheduled on less notice that required by these Rules or the Fed.R.Bankr.P. except by Order of the Court, on written motion (served on all interested parties) specifying the exigencies justifying shortened notice." In addition, Bankruptcy Rule 9006(c) provides that when an act is required to be done within a specified period of time by the Bankruptcy Rules "the court for cause shown may in its discretion with or without motion or notice order the period reduced."

2. The Motion of the Official Committee of Asbestos Personal Injury Claimants and David T. Austern, the Court Appointed Legal Representative for Future Asbestos Personal Injury Claimants to Compel Testimony and Document Production Concerning Grace's Per-Petition Estimates of Its Personal Injury Asbestos Liability [D.I. 15005] (the "Motion to Compel"), as well as W.R Grace's Objection to Motion to Compel Testimony and Document Production Concerning Grace's Pre-Petition Asbestos Liability Estimates [D.I. 15185] (the "Objection"), and the Reply of Official Committee of Asbestos Personal Injury Claimants and David T. Austern, Legal Representative for Future Asbestos Personal Injury Claimants, in Support of

Motion to Compel Testimony and Document Production Concerning Grace's Pre-Petition Estimates of Its Personal Injury Asbestos Liability (the "Reply") are scheduled to be heard at the omnibus hearing on May 2, 2007. The Motion to Seal, which is related to four exhibits attached to the Reply, should be heard at the same hearing.

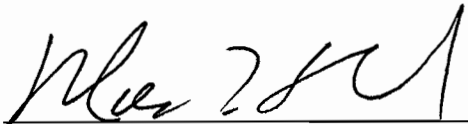
3. In this case, exigencies exist which justify shortened notice and for leave from the Scheduling Order and CMO to enable the Movants to have the Motion to Seal heard on May 2, 2007, if necessary. The Movants also respectfully requests that the Court establish May 1, 2007 at 4:00 p.m. as the deadline to object to the Motion to Seal. Granting the relief requested herein will allow the Motion to Compel, as well as the Objection and the Reply, to be heard during the May 2, 2007 hearing and will allow the discovery at issue in the Motion to Compel to move forward on a timely basis. In addition, addressing the discovery dispute during the May 2, 2007 hearing will allow the parties to continue to move forward with the discovery necessary to hold the Asbestos Personal Injury Estimation Hearing on the current schedule.

4. Notice of this Motion has been provided to: (a) Office of the United States Trustee; (b) counsel to each of the Official Committees; (c) the Debtors; and (c) all parties who have requested notice pursuant to Bankruptcy Rule 2002. Counsel for the Movants submit that, in light of the nature of the relief requested, that the limited notice described above is appropriate, as is leave from the Scheduling Order and CMO.

WHEREFORE, the Movants respectfully request the entry of an Order: (i) shortening the notice period as set forth herein; (ii) granting the Movants leave from the Scheduling Order and the CMO; and (iii) establishing the objection deadline on the Motion to Seal as May 1, 2007 at 4:00 p.m.

Dated: April 24, 2007

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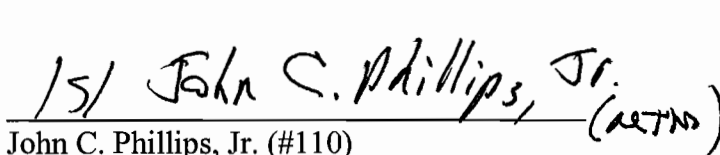
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